

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION**

IN RE:)	
)	CASE NO. 19-13220-PMM
JOHN THOMAS KEENAN)	CHAPTER 13
DEBTOR)	
)	

**NOTICE OF APPEARANCE PURSUANT TO BANKRUPTCY RULE 9010 (b) AND
REQUEST FOR NOTICES UNDER BANKRUPTCY RULE 2002 REGARDING
PROPERTY DESCRIBED AS 5177 FOXCROFT DR, SCHNECKSVILLE, PA 18078
AND THAT CERTAIN LOAN MORE SPECIFICALLY IDENTIFIED AS LOAN
NUMBER *****3856**

NOW COMES Freedom Mortgage Corporation, by and through its attorney Brock and Scott, PLLC, pursuant to Bankruptcy Rule 9010 and makes its appearance as a creditor in this cause and, pursuant to Bankruptcy Rule 2002, requests that it be noticed on all pleadings, documents and hearings; that it receive copies of all documents; and be added to the matrix to be served at the addresses below:

Mario Hanyon
Brock and Scott, PLLC
Attorneys at Law
302 Fellowship Road, Ste 130
Mount Laurel, NJ 08054
pabkr@brockandscott.com

Freedom Mortgage
10500 Kincaid Drive
Fishers, Indiana 46037

Please take notice that the undersigned hereby appears as counsel for Freedom Mortgage Corporation pursuant to Bankruptcy Rule 9010(b). The undersigned's filing of this notice is limited to the instant case noted above and should not be construed as unlimited representation of the

21-08190 BKSUP01



Creditor with respect to any and all matters, proceedings, or actions that may be taken in the instant case or any associated case or proceeding involving the above-named Creditor.

RESPECTFULLY SUBMITTED,

/s/ Mario Hanyon

Mario Hanyon
Attorney at Law (203993)
Brock & Scott, PLLC
302 Fellowship Road, Ste 130
Mount Laurel, NJ 08054
844-856-6646 x4560
704-369-0760
pabkr@brockandscott.com